



March 15, 2017

Attention: Carpet Team
Department of Resources Recycling and Recovery
1001 I Street
Sacramento, CA 95812
Submitted via email: carpet@calrecycle.ca.gov

SUBJECT: COMMENTS ON REVISED CALIFORNIA CARPET STEWARDSHIP PLAN 2017-2021

Dear Carpet Team at CalRecycle:

We have been involved with and supported the first in the world carpet stewardship law. When it was being negotiated, we had concerns about the bill lacking performance goals such as a recycling rate with dates but supported the opportunity to give the industry the chance to set goals and design how they would achieve them with oversight and approval of the Plan by CalRecycle. It has been six years since the enactment of Assembly Speaker Perez's AB 2398 and the legislated goal of "continuous and meaningful improvement" of carpet recycling in California, which has not yet been met under CARE's program. We have stated repeatedly our concerns with the Plan and program submitting many letters, giving oral testimony at public hearings, and even participating on the Carpet Advisory Council and spending hundreds of hours of time trying to help CARE.

Yet, with all this advice and support, CARE's stewardship plan was deemed non-compliant by CalRecycle on September 30, 2014 and CalRecycle just submitted last Friday March 10, 2017, an Accusation of CARE for failing to demonstrate to the Department that it has achieved continuous and meaningful improvement in 2013, 2014, and 2015.

We urge CalRecycle to not approve CARE's Revised California Carpet Stewardship Plan 2017-2021.

While the Plan had modest improvements, on whole, it is too little too late and still does not make large enough investments to ensure all California fee payers have access and knowledge of convenient recycling opportunities.

We must question the commitment of the industry. They would never let their companies or product lines fail, but they are not providing the resources necessary, adequately fund market development, nor provide long-term subsidies to investors to ensure that carpet is recycled. We have concluded that the program is not going to work while in the control of the CARE board.

Sincerely,

Heidi Sanborn, Executive Director
California Product Stewardship Council and National Stewardship Action Council

Juliana Bryant, City Government Zero Waste Senior Coordinator
San Francisco Department of the Environment

Michael Gross, Zanker Recycling

Patrick Carter, Executive Director
Sonoma County Waste Management Agency

John Davis, Administrator
Mojave Desert Joint Powers Authority

Cc: Bob Peoples, CARE
Howard Levenson, CalRecycle